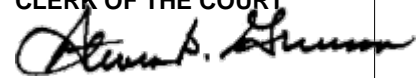


Exhibit A

Plaintiff's Complaint

Electronically Filed
1/27/2022 11:26 AM
Steven D. Grierson
CLERK OF THE COURT



COMP
Scott L. Poisson, Esq.
Nevada Bar No. 10188
Amber N. King, Esq.
Nevada Bar No. 14070
BERNSTEIN & POISSON
700 S. Jones Blvd.
Las Vegas, Nevada 89107
Telephone: (702) 877-4878
Facsimile: (702) 256-6280
Attorneys for Plaintiff

CASE NO: A-22-847341-C
Department 4

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

RHONDA COLLINS, an individual,

Plaintiff,

Case No.:

Dept. No.:

v.

CARRIAGE CEMETERY SERVICES, INC.,
doing business as BUNKER'S MEMORY
GARDENS MEMORIAL PARK, CARRIAGE
SERVICES OF NEVADA, INC., doing business
as BUNKER'S MEMORY GARDENS
MEMORIAL PARK; DOES 1 through 100; and
ROE CORPORATION 101 through 200,
inclusive,

Defendant(s).

COMPLAINT

COMES NOW, the Plaintiff, by and through her counsel of record, BERNSTEIN & POISSON, submits this complaint against Defendants for the foregoing causes of action, and alleges as follows:

JURISDICTION

1. Rhonda Collins, (hereinafter "Plaintiff") is individual residing in Clark County, Nevada.
2. Carriage Cemetery Services, Inc. is a Nevada corporation, doing business in Clark County, Nevada as Bunker's Memory Gardens Memorial Park.
3. Carriage Services of Nevada, Inc., is a Nevada corporation, doing business in Clark County, Nevada as Bunker's Memory Gardens Memorial Park.

1 4. DOE and ROE Defendants 1 through 200 are legal entities/residents of Clark
2 County, Nevada, and authorized to do business by the State of Nevada. Furthermore, said Doe
3 and Roe Defendants were employees, agents, or servants of Defendants in its control and
4 functioned and assisted in the operation, control maintenance and/or management of the premise,
5 in which plaintiff was injured, causing damages.

6 5. The true names and capacities, whether individual, corporate, associate or
7 otherwise of Defendants DOES 1 through 100 and ROE CORPORATIONS 101 through 200,
8 inclusive, are unknown to Plaintiff who therefore sues said Defendants by such fictitious names;
9 on information and belief, Plaintiff alleges that the Defendants, and each of them, designated
10 herein as a DOE or ROE CORPORATION were responsible in some manner for the injuries
11 sustained by the Plaintiff resulting from the below stated incident; and is liable for all damages
12 due to Plaintiff as alleged herein. Plaintiff will ask leave of court to amend this Complaint to
13 insert the true names and capacities when the same is ascertained and to join such Defendants in
14 this action.

15 6. DOES 1 through 5 are entities responsible for maintaining the property known as
16 Bunker's Memory Gardens memorial Park, located at 7251 W. Lone Mountain Road, Las Vegas,
17 NV 89129. DOES 6 through 10 are entities or individuals who installed or maintained the
18 property known as Bunker's Memory Gardens memorial Park, located at 7251 W. Lone
19 Mountain Road, Las Vegas, NV 89129. DOES 11 through 15 are the entities or individuals
20 responsible for completing construction involved with the operation of and around the property
21 known as Bunker's Memory Gardens memorial Park, located at 7251 W. Lone Mountain Road,
22 Las Vegas, NV 89129. DOES 16 through 20 are entities or individuals responsible for the
23 maintenance and inspection of the property known as Bunker's Memory Gardens memorial Park,
24 located at 7251 W. Lone Mountain Road, Las Vegas, NV 89129. DOES 21 through 25 are
25 manufacturers or designers of the sprinkler and related materials required for the installation of
26 the sprinkler which are subject to this complaint. DOES 26 through 30 are contractors or
27 subcontractors hired to provide or maintain the subject property and sprinklers at the property
28 known as Bunker's Memory Gardens memorial Park, located at 7251 W. Lone Mountain Road,

1 Las Vegas, NV 89129. Plaintiffs will ask leave of this court to insert the true names and
2 capacities of such Defendants when the same have been ascertained.

3 **CLAIM FOR NEGLIGENCE**

4 7. Defendants constructed, installed, maintained and had control over the property
5 known as Bunker's Memory Gardens memorial Park, located at 7251 W. Lone Mountain Road,
6 Las Vegas, NV 89129 (hereinafter "the Property").

7 8. On June 20, 2021, Rhonda Collins was legally on the premise owned and
8 operated by Defendants.

9 9. While Ms. Collins was walking through the property, she slipped and fell on a
10 unkept walkway that had slime and sludge buildup under a wet surface.

11 10. It was reasonably foreseeable that a person would walk across this area.

12 11. Defendants were in charge of maintaining the Property.

13 12. The area where Ms. Collins fell was in the area requiring maintenance.

14 13. Defendants had a duty to properly maintain the common area and provide an
15 area that was safe for use.

16 14. Defendants breached their duty by failing to maintain and provide a safe walkway
17 area.

18 15. Defendants, and each of them, had a duty to supervise and maintain said premises
19 in a reasonably safe and suitable condition for its patrons, guests and invitees; and further to take
20 any and all reasonable precautions to avoid the presence of dangerous conditions on or around
21 said premises.

22 16. Defendants had a duty to inspect and maintain the walkway area in a safe and
23 reasonable manner to ensure safe use of the walkways.

24 17. Defendants breached their duty by failing to maintain the walkway and ensure its
25 safe use and operation.

26 18. Defendants and their employees knew or should have known about the dangerous
27 condition, which caused the injuries to Plaintiff, yet continued to let this condition exist, causing
28 an unreasonable threat to the safety of those on their property, including Plaintiff.

320 S. Jones Blvd.

Las Vegas, Nevada 89107
OFFICE: (702) 877-4878 FAX: (702) 256-6280

- 1) For General and Special Damages in a sum in excess of \$15,000.00;
- 2) For Attorneys' fees and costs of suit incurred herein;
- 3) For interest at the statutory rate; and
- 4) For such other and further relief as the Court may deem just and equitable in the matter.

DATED this 27th day of January, 2022

Respectfully submitted,

BERNSTEIN & POISSON

/s/ Amber N. King
SCOTT L. POISSON, ESQ.
State Bar No. 010188
AMBER N. KING, ESQ.
State Bar No. 14070
700 S. Jones Blvd.
Las Vegas, Nevada 89107
(T) (702) 877-4878
(F) (702) 256-6280
Email: amber@vegashurt.com
Attorneys for Plaintiff